## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, Plaintiff,

vs.

CR 05-1849-JH

JORGE LUIS ORTIZ-MOFFETT.

Defendant.

## JOINDER IN <u>DEFENDANTS' UNOPPOSED JOINT MOTION</u> TO CONTINUE THE DEADLINE TO SUBMIT PRE-TRIAL MOTIONS

Defendant Jorge Luis Ortiz-Moffett, through local counsel Tova Indritz, hereby joins in the motion filed by the CJA defendants on March 6, 2006, seeking to extend the deadlines for filing of motions as follows:

- a) to extend the deadline for filing Pre-Trial Motions to June 16, 2006,
- b) to extend the deadline for the Government's responses to August 4, 2006, and
- c) to extend the deadline for replies to the Government's responses to August 18, 2006..

  for the reasons stated in the DEFENDANTS' UNOPPOSED JOINT MOTION TO CONTINUE THE

  DEADLINE TO SUBMIT PRE-TRIAL MOTIONS.

Assistant U.S. Attorney James Braun does not oppose this motion and concurs in the proposal that all of the multiple defendants' motions be due at the same time.

Respectfully submitted,

Tova Indritz, Attorney at Law Local counsel for defendant Jorge Luis Ortiz-Moffett 715 Tijeras Avenue, NW Albuquerque, NM 87102 Telephone (505) 242-4003 Facsimile (505) 242-3125

## Certificate of Service

I hereby certify that this 7th day of March, 2006, I have mailed, faxed, or electronically transmitted a copy of the foregoing pleading to Assistant United States Attorney James Braun, P. O. Box 607, Albuquerque, NM 87103, fax 346-7296,

and to all of the co-defendants' counsel, including the following:

Scott M. Davidson, 204 Bryn Mawr Drive NE, Albuquerque, NM 87106

Brian A. Pori, 204 Bryn Mawr NE, Albuquerque, NM 87106, Counsel for Defendant Mike Hannah Robert R. Cooper, 1011 Lomas Blvd NW, Albuquerque, NM 87102, Counsel for Defendant Adrian Sanford

Martin Lopez III, 1500 Mountain Road NW, Albuquerque, NM 87104, Counsel for Defendant Geno Berthod,

Joe M. Romero, Jr., 1905 Lomas Blvd. NW, Albuquerque, NM 87104-1207, Counsel for Defendant Dana Jarvis

Ann Steinmetz, Box 4305, Albuquerque, NM 87196-4305, Counsel for Defendant Mary Cannant Val Whitley, 208 Griffin St., Santa Fe, NM 87501, Counsel for Defendant Barbara Hanna

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Kirtan K. Khalsa, 812 Marquette NW, Albuquerque, NM 87102, Counsel for Defendant Sam Jones Edward O. Bustamante, 610 Gold Ave. SW #214, Albuquerque, NM 87102, Counsel for Defendant Ralph Greene

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Penni Adrian, 4300 Carlisle Blvd. NE, Suite 4, Albuquerque, NM 87107, Counsel for Defendant Russell Trujillo

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Tova Indritz	